

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Petition by the United States Dept.)	NSD-L-99-24
of Transportation for Assignment of)	
an Abbreviated Dialing Code (N11))	
to Access Intelligent Transportation)	
(ITS) Services Nationwide)	
)	
Request by the Alliance of Information)	NSD-L-98-80
and Referral Systems, United Way of)	
America, United Way 211 (Atlanta,)	
Georgia), United Way of Connecticut,)	
Florida Alliance of Information and)	
Referral Services, Inc., and Texas I&R)	
Network for Assignment of 211 Dialing)	
Code)	
)	
The Use of N11 Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	

SUPPLEMENTAL COMMENTS OF NEXTEL COMMUNICATIONS, INC.

Nextel Communications, Inc. (“Nextel”) hereby submits these supplemental comments in response to the Federal Communications Commission’s (“Commission”) request¹ for parties to refresh the record concerning outstanding Petitions for Reconsideration of the Commission’s July 31, 2000, *Third Report and Order and Order on Reconsideration* (“Order”) designating 211 and 511 as abbreviated dialing codes.²

¹ See *Public Notice, Parties Asked to Refresh Record Regarding Reconsideration of the Designation by the Commission of 211 and 511 as Abbreviated Dialing Codes*, CC Docket No. 92-105, DA 04-3219 (rel. Oct. 8, 2004); see also *Parties Asked to Refresh Record Regarding Reconsideration of the Designation by the Commission of 211 and 511 as Abbreviated Dialing Codes*, 69 FED. REG. 63151 (Oct. 29, 2004) (setting November 12, 2004, comment date).

² *Use of N11 Codes and Other Abbreviated Dialing Arrangements, Third Report and Order and Order on Reconsideration*, 15 FCC Rcd 16753 (2000) (hereinafter “Order”).

I. INTRODUCTION

On March 12, 2001, Nextel filed a Petition for Reconsideration (“Petition”) of the *Order*.³ In the Petition, Nextel requested that the Commission reconsider certain aspects of its decision to establish the 511 abbreviated dialing code for “traveler information services,” and the 211 abbreviated dialing code for “access to community information and referral services.”⁴ In these supplemental comments, Nextel requests that the Commission further clarify the use of 211 codes. Specifically, the Commission should clearly delineate what parties or agencies are entitled to request the provision of 211 access. In addition, the Commission should also specify the geographic boundaries within which 211 and 511 service may be requested.

II. THE COMMISSION SHOULD CLARIFY THE SCOPE OF ENTITIES THAT ARE ENTITLED TO REQUEST 211 DEPLOYMENT

In the *Order*, the Commission found that “access to community information and referral services using 211 will provide a vital adjunct to existing 311 services,” and therefore assigned “211 to be used to provide access to community information and referral services.”⁵ In doing so, however, the Commission failed to clearly delineate those entities entitled to request 211 service or even provide criteria to be used for designating the organizations entitled to request 211 services. Instead, the Commission merely stated that “when a provider of telecommunications services receives a request from an entity (e.g., the United Way) to use 211 for access to community information and

³ Petition for Reconsideration of Nextel Communications, Inc., NSD-L-99-24, NSD-L-98-80, CC Docket No. 92-105 (filed March 12, 2001) (hereinafter “Petition”).

⁴ *Id.* at 2.

⁵ Order, 15 FCC Rcd at 16766.

referral services,” that carrier must take “any steps necessary” to complete the 211 calls from subscribers to the requesting entity.⁶

Due to this ambiguity, Nextel’s Petition requested that the Commission take action to set guidelines for designation of organizations that are entitled to request 211 deployment.⁷ Since the Petition was filed in 2001, the number of organizations requesting access for such 211 services has grown substantially. In addition, the organizations offering such 211 services have grown more diverse. Certain states have responded to this by creating a single statewide contact for 211 calls that then refers those calls to centers within local communities.⁸ In other states, however, the decision to offer 211 services is left to local community organizations.

In Florida, for instance, the Crisis Center of Tampa Bay, Inc. offers residents of Hillsborough County suicide prevention and mental health services through its 211 call center.⁹ In adjoining Pinellas County, however, the 211 call center operated by 211

⁶ *Id.*

⁷ See Petition at 5 (stating that the Commission’s current 211 policies are “not sufficiently clear to either (a) put carriers on notice as to the entities required to use 211 on their systems, or (b) put consumers on notice of the information available via 211”).

⁸ See, e.g., Connecticut 211 Infoline, *available at* <http://www.infoline.org/AboutUs/Default.asp> (stating that “2-1-1 Infoline is an integrated system of help via the telephone – a single source for information about community services, referrals to human services, and crisis intervention” that can be “accessed toll-free from anywhere in Connecticut by simply dialing 2-1-1”).

⁹ See 211 Nationwide Status, *available at* <http://www.211.org/status.html> (noting that the Crisis Center of Tampa Bay provides 211 service for Hillsborough County, Florida); *see also* Crisis Center of Tampa Bay, Inc. website, *available at* <http://www.crisiscenter.com> (stating that the Crisis Center provides “crisis and suicide intervention and community resource referral”).

Tampa Bay Cares, Inc. offers general health and volunteer information.¹⁰ In addition, other local social service agencies – offering a very broad array of services – have also indicated an interest in 211 access.¹¹ Under the Commission’s current rules, all of these organizations could request use of the 211 code in the same geographic area, leaving Nextel and other wireless carriers in the position of determining which of those entities is entitled to the service. The Commission, not wireless carriers, should determine the eligibility and priority of entities that can request 211 service. Carriers cannot be placed in the position of choosing between competing organizations.

III. THE COMMISSION SHOULD PROVIDE GEOGRAPHIC BOUNDARIES FOR BOTH THE 211 AND 511 DIALING CODES

The Commission should also clarify the *Order* by providing geographic boundaries for 211 and 511 services. In its Petition, Nextel noted that wireless carriers face “a number of technical complexities” in routing 211 and 511 codes.¹² The basic nature of wireless services (*i.e.*, the fact that RF signals do not recognize political or other boundaries) creates complexities for routing 211 and 511 calls to the appropriate designee. If the boundaries are too localized, the routing of such calls becomes increasingly complex and raises the possibility that calls will be misrouted. Accordingly, Nextel urges the Commission to clarify that carriers are not required to route calls based

¹⁰ See 211 Nationwide Status, available at <http://www.211.org/status.html> (noting that Tampa Bay Cares, Inc. “answers calls from individuals and families seeking resources for assistance and volunteerism as well as telephone crisis intervention”).

¹¹ It appears that some states are also considering use of the 211 abbreviated dialing code to provide Homeland Security related information. See, e.g., *Strategic Plan for Implementing 2-1-1 in Arizona*, *The Governor’s Council on 2-1-1*, at 13 (rel. April 23, 2004), available at <http://www.az211.gov/strategicplan.pdf> (“Special homeland security citizen awareness bulletins and instructions to citizens pertaining to threats and actual terrorist events could be posted on the 2-1-1 system in response.”).

¹² Petition at 6.

on narrow geographic areas. In addition, the Commission should also take steps to encourage statewide 211 and 511 implementation.

CONCLUSION

For the aforementioned reasons, Nextel again urges the Commission to reconsider certain aspects of its *Third Report and Order and Order on Reconsideration* designating 211 and 511 as abbreviated dialing codes.

Respectfully submitted,

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